

Jae H. Cho, Esq.
 CHO LEGAL GROUP, LLC
 100 Plainfield Ave. Ste. 8E
 Edison, NJ 08817
 (732) 545-9600
 Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

WAYNE BALIGA, derivatively on behalf of	:	
LINK MOTION INC. (F/K/A NQ MOBILE	:	1:18-cv-11642
INC.	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
LINK MOTION INC. (F/K/A NQ MOBILE	:	
INC.), VINCENT WENYONG SHI, JIA	:	
LIAN, XIAO YU,	:	
	:	
Defendants	:	
<hr/>		
AI CAPITAL CHINA	:	
	:	
Intervenor Plaintiff,	:	
	:	
vs.	:	NOTICE OF MOTION TO INTERVENE
	:	AS OF RIGHT
LINK MOTION INC. (F/K/A NQ MOBILE	:	
INC.), VINCENT WENYONG SHI, JIA	:	
LIAN, XIAO YU,	:	
	:	
Defendants	:	

PLEASE TAKE NOTICE that on November 22, 2019, at 9:00 a.m., or soon thereafter as the Court will order, Intervenor Plaintiff AI Capital through their counsel Cho Legal Group, LLC, will move before this Honorable Court for an order permitting AI Capital to intervene in this action as a matter of right under Federal Rule of Civil Procedure 24(a)(2).

PLEASE TAKE FURTHER NOTICE that in support of this motion Intervenor Plaintiff shall rely upon the Certification and brief of Jae H. Cho, Esq., with other documents, attached hereto.

PLEASE TAKE FURTHER NOTICE that a proposed order is attached.

Respectfully submitted,

_____/s/ Jae H. Cho_____

Jae H. Cho, Esq.

Attorney for Intervenor Plaintiff AI Capital China

Cho Legal Group LLC

100 Plainfield Avenue

Edison, NJ 08817

(732) 545-9600

Dated: November 1, 2019